



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

HON. SYLVIA O. HINDS-RADIX  
*Corporation Counsel*

JAMES R. MURRAY  
*Assistant Corporation Counsel*  
Phone: (212) 356-2372  
Fax: (212) 356-3509  
Email: jamurray@law.nyc.gov

November 30, 2022

**BY ECF**

Honorable Brian M. Cogan  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Jennifer Crespo, et al., v. City of New York, et al.*,  
22-CV-2693 (BMC)

Your Honor:

I am an Assistant Corporation Counsel in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney for Defendants City of New York, Joseph Ieraci, Angelo Perozzi, Laurene Bove, and Zachary Cullen (“Defendants”) in the above-referenced matter. Defendants write jointly with Plaintiffs to certify to the Court that the parties have completed discovery and to propose a deadline to file pre-motion conference letters.

In accordance with the Court’s September 23, 2022 Order, the parties completed discovery on November 23, 2022. Now that discovery has closed, both parties anticipate moving for summary judgment. Accordingly, the parties respectfully propose that the Court schedule the deadline for filing pre-motion conference letters for January 6, 2023. The parties propose this deadline because six of the eight depositions taken in this matter were conducted between November 16, 2022 and November 23, 2022, and the parties have not yet received the transcripts from those depositions. Plaintiffs’ counsel has also advised me that he will be out of the office on a previously scheduled vacation between December 16<sup>th</sup> and December 30<sup>th</sup>, 2022. Because the Court typically schedules the deadline to file dispositive motions for two weeks after the pre-motion conference, the parties require the requested time to thoroughly review the deposition transcripts, have their clients review the transcripts for accuracy, confer as to whether motion practice can be avoided or simplified with regard to certain issues, and prepare their arguments before filing their pre-motion conference letters.

Accordingly, the parties request that the Court schedule the deadline to file pre-motion conference letters for January 6, 2023.

The parties thank the Court for its time and consideration herein.

Respectfully submitted,

James R. Murray s/\_\_\_\_\_  
James R. Murray  
Assistant Corporation Counsel  
New York City Law Department  
100 Church Street, Room 3-183  
New York, New York 10007  
(212) 356-2372  
jamurray@law.nyc.gov

CC: **By ECF**  
All counsel of record